REMARKS / ARGUMENTS

Applicant hereby affirms the provisional election made by telephone on October 7, 2003 to Group I, claims 1-3 and 16-18. Claims 4-15 and 19-23 have been withdrawn.

Claims 1, 16-18 and 24-37 are presently pending. Each of the independent claims 1, 16, 36 and 37 include limitations not disclosed by, nor made obvious in view of, the prior art.

Claims 1, 36 and 37 include analogous limitations of operations "to be performed on a pixel" of a digital image. Note that Harada is only concerned with operations performed on a "three-dimensional model object". See e.g., Harada's Abstract and Summary at col. 3, lines 40-44. The Examiner notes that Harada does not disclose pixel-level operations.

Although the Examiner offers Drebin for "allowing user to modify an image at pixel-level detail" this does not render the present claims obvious. The independent claims recite displaying "a visual sequence of . . . operations" on pixels (Claims 1, 36 and 37) and also "displaying a graph of a sequence of the operations relating to one or more pixels" (Claim 16). Neither Harada or Drebin show pixel operations or a display of a sequence of pixel operations. There is also nothing in the prior art to show how to combine Harada and Drebin to achieve a display of pixel operations. Note that pixel operations, and the process of operating on pixels, is very different from operations on three-dimensional solid objects. Examples of pixel operations are recited in claim 33.

Claims 1, 36 and 37 also recite specific steps to show a visual presentation of the type and order of operations. For example, in claim 1 "a first visual indicator corresponds to the first operation and a second visual indicator corresponds to the second operation, and . . . the order of application of operations is shown". Harada does not ever disclose such visual indicators. In fact, no graphical user display of any kind is ever mentioned in Harada as all of the editing operations appear to be keyword commands such as "UNDO" and "REDO". See Harada at col. 3, line 1. Although Harada's Fig. 2 illustrates a type of graph, this is merely to show pictorially how the system organizes data internally. The design of Fig. 2 is never displayed to a user and there is no disclosure of user interaction or manipulation of the objects of Fig. 2. On the other hand, the visual nodes and connectors of the present invention are recited as

being modified as, e.g., "accepting a signal from a user input device to indicate modification of the visual sequence".

Applicant respectfully requests that a timely Notice of Allowance be issued in this case. If the Examiner believes a telephone conference would expedite prosecution of this application, please telephone the undersigned at 415-279-5098.

Respectfully submitted,

April 26, 2004
Date

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